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PLEASE DO NOT REPLY TO THIS OFFICE

May 24, 2022

VIA ECF

The Honorable Judith C. McCarthy
United States Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

SO ORDERED:

Application granted.

 5-24-22
JUDITH C. MCCARTHY
United States Magistrate Judge

Re: *United States v. Julio Alberto Taveras Abreu*
21 Mag. 11434

Dear Judge McCarthy:

Please recall that Peter Frankel, Esq., and I represent Mr. Julio Alberto Taveras Abreu in the above-referenced matter. For the reasons that follow, I write to respectfully request that Your Honor permit Mr. Taveras Abreu to travel to the Commonwealth of Pennsylvania on Thursday, June 2, 2022 for a motions hearing in a pending criminal prosecution against him in the Monroe County Court of Common Pleas. I have consulted with A.U.S.A. Kevin Sullivan and United States Pretrial Services Officer Laura Gialanella, both of whom have no objection to this request.

Currently, Mr. Taveras Abreu is at liberty on a \$100,000 personal recognizance bond set before Your Honor on December 2, 2021. The terms of the bond are as follows: travel restricted to the Southern and Eastern Districts of New York and, upon application to the Court, to Pennsylvania for court appearances; the surrender of all travel documents to Pretrial Services and no new applications; supervision as directed by Pretrial Services; and GPS monitoring and home detention. On March 4, 2022, Magistrate Judge Paul E. Davidson modified Mr. Taveras Abreu's bail conditions to permit him to attend religious services at Iglesia Casa de Jehova in White Plains, New York, and to permit him to travel to our Manhattan office when necessary without needing to obtain pre-approval from Pretrial Services. On April 1, 2022, Your Honor modified Mr. Taveras Abreu's bail conditions to permit him to obtain employment.

As Your Honor is aware, Mr. Taveras Abreu has a criminal case pending in the Commonwealth of Pennsylvania. On May 18, 2022, Judge Jonathan Mark of the Monroe County Court of Common Pleas issued an Order scheduling a pre-trial motions hearing for June 2, 2022 at 11:00 a.m.¹ If granted the requested modification, Mr. Taveras Abreu would travel to the Monroe County Courthouse, located at 610 Monroe Street in Stroudsburg, Pennsylvania, on June

¹ The May 18, 2022 Order is attached hereto.

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2, 2022 for his 11:00 a.m. court appearance. Mr. Taveras Abreu would then promptly return to his home. Thank you for your consideration of this request.

Respectfully submitted,



Mark I. Cohen

MIC/gmf

Cc: A.U.S.A. Kevin Sullivan (via ECF)
U.S.P.T.S.O. Laura Gialanella (via ECF)
Mr. Julio Alberto Taveras Abreu (via email)

Monroe County Clerk of Courts Filed 5/18/2022 2:24 PM

Commonwealth of Pennsylvania
v.
Julio Alberto Taveras Abreu

IN THE COURT OF COMMON PLEAS OF MONROE
COUNTY, PENNSYLVANIA

CRIMINAL DIVISION

DOCKET NO: CP-45-CR-0000838-2021

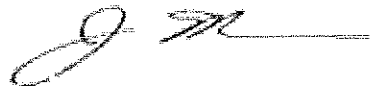
ORDER OF COURT

AND NOW, this 18th day of May, 2022, upon consideration of the Defendant's Motion Nunc Pro Tunc Omnibus Pretrial Motion and Motion to Dissolve Bench Warrant, it is ORDERED as follows:

1. The previously issued Bench Warrant is DISSOLVED.
2. A hearing on Defendant's request for nunc pro tunc relief and discovery is scheduled for June 2, 2022, at 11:00 am, in Courtroom to be determined, Monroe County Courthouse, Stroudsburg, Pennsylvania.
3. The parties shall be prepared to discuss the timing of Defendant's pre-trial motion.
4. The parties shall meet to discuss the discovery issues raised in Defendant's motion, as well as any objections raised by the Commonwealth. The meeting shall occur no later than five (5) days prior to the hearing scheduled in this order.
5. The scheduling of any subsequent hearings will be discussed at the hearing.

CC: District Attorney
Martin Souto-Díaz, Esq.

BY THE COURT:



Judge Jonathan Mark